

SPCC Plan Review - Gap Analysis
for
Host Command, Installation Name, State
SPCC Plan Date: _____
Gap Analysis Date: _____

Introduction

On 17 July 2002, the United States Environmental Protection Agency (EPA) revised the Oil Pollution Prevention regulations contained in 40 Code of Federal Regulations (CFR) Part 112. Compliance with these regulations requires each facility subject to the regulations to review and update, if necessary, its Spill Prevention, Control, and Countermeasure (SPCC) Plan. Changes to a facility's SPCC Plan may also impact portions of its Facility Response Plan (FRP), where such a plan is required by 40 CFR § 112.20. (*"Installation Name" does not have an FRP.*)

***Installation Name* SPCC Plan Review**

[Name of contractor] performed a Gap Analysis for the "*Installation Name*" SPCC plan, dated "*Plan Date.*" The purpose of this analysis was to compare the existing SPCC Plan to the SPCC-specific requirements of 40 CFR §§ 112.1 through 112.8, as published in the 17 July 2002 Federal Register. ([Name of contractor] also reviewed those portions of the FRP impacted by the SPCC rule change.)

The results of the analysis are presented in the attached spreadsheet. The spreadsheet identifies for each regulatory requirement:

1. If the information was present in the SPCC Plan;
2. If it was missing from the SPCC Plan; or
3. If the information presented in the SPCC Plan was incomplete (i.e., did not fulfill regulatory requirements).

The SPCC Plan's regulatory compliance deficiencies are also summarized below. These deficiencies are categorized as either "major" or "minor." Major deficiencies are compliance requirements that may take significant resources to achieve. For example, requirements to update an oil inventory or develop and implement inspection programs are considered "major." Minor deficiencies are compliance requirements that are not considered major (e.g., requirements to clarify SPCC Plan text or document existing SPCC procedures).

Regulatory Deficiencies

Major

Describe each deficiency and cite the applicable section of 40 CFR Part 112 identifying the compliance requirement.

Minor

Describe each deficiency and cite the applicable section of 40 CFR Part 112 identifying the compliance requirement.